

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BEVERLY ADKINS, CHARMAINE
WILLIAMS, REBECCA PETTWAY, RUBBIE
McCOY, WILLIAM YOUNG, on behalf of
themselves and all others similar situated, and
MICHIGAN LEGAL SERVICES

Plaintiffs,

-against-

MORGAN STANLEY, MORGAN STANLEY
& CO. LLC, MORGAN STANLEY ABS
CAPITAL I INC., MORGAN STANLEY
MORTGAGE CAPITAL INC., and MORGAN
STANLEY MORTGAGE CAPITAL
HOLDINGS LLC,

Defendants.

INDEX NO. 12-CIV-7667 (HB) (GWG)

**PLAINTIFFS' MOTION TO FILE
LETTER AND EXHIBITS UNDER SEAL**

Pursuant to Paragraph 12.1 of the parties' Stipulated Proposed Amended Protective Order entered by the Court in this action on March 25, 2013, ECF No. 44 (the "Protective Order"), Plaintiffs hereby move for entry of an order granting leave to file under seal an unredacted version of Plaintiffs' May 15, 2014 letter to the Honorable Gabriel W. Gorenstein, and Exhibits B-I thereto. That letter is submitted in further support of Plaintiffs' motion to compel Defendants to produce certain discovery materials in the possession of the Massachusetts Attorney General.

1. Pages 7-12 of Plaintiffs' letter to the Court contain discussion of and citation to deposition testimony by 8 Morgan Stanley witnesses, in which those witnesses discuss discovery materials that have, pursuant to the Protective Order, been deemed confidential by Defendants.

2. Exhibits B-I to Plaintiffs' letter to the Court are excerpts of the deposition transcripts referenced in paragraph 1, above.
3. In the event that the Court directs that these materials be filed under seal, Plaintiffs will file a sealed copy of the above materials with the Clerk of the Court via ECF.
4. Plaintiffs intend to challenge the designation as confidential of all relevant materials pursuant to Paragraph 12.2 of the Protective Order.

WHEREFORE, Plaintiffs respectfully request that the Court issue an Order permitting Plaintiffs to file an unredacted version of their May 15, 2014 letter to the Honorable Gabriel W. Gorenstein, and Exhibits B-I thereto, under seal.

Dated: May 15, 2014

Respectfully submitted,

By: _____ /s/

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CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2014, I electronically filed the foregoing with the Clerk of the Court for the Southern District of New York, via the CM/ECF system. Case participants who are registered CM/ECF users will be served by the appellate CM/ECF system.

Dated: May 15, 2014

By: _____/s/
Rachel E. Goodman

Counsel for Plaintiffs and the Proposed Class